

date for the Moderate area plan submission.<sup>137</sup> In keeping with this historical approach, the EPA established December 31, 2014, as the starting point for the first 3-year period under CAA section 189(c) for the 2006 PM<sub>2.5</sub> standards in the South Coast. This date was the due date established in the EPA's June 2, 2014 Deadline and Classification Rule for the State's submission of any additional attainment-related SIP elements necessary to satisfy the subpart 4 Moderate area requirements for the 2006 PM<sub>2.5</sub> NAAQS in the South Coast area.<sup>138</sup> Thus, December 31, 2017 and December 31, 2020, are the milestone dates that the Serious area plan must address, at minimum. The EPA believes that establishing December 31, 2017, as the first quantitative milestone date is an appropriate means for implementing the requirements of subpart 4 for the 2006 PM<sub>2.5</sub> NAAQS.

The PM<sub>2.5</sub> SIP Requirements Rule also requires that Serious area attainment plans contain one additional quantitative milestone to be met in the three-year period following the Serious area attainment date.<sup>139</sup> If the area fails to attain, this additional milestone provides the EPA with the tools necessary to monitor the area's continued progress toward attainment while the state develops a new attainment plan under CAA section 189(d).

#### 2. RFP Plan and Quantitative Milestones in the 2016 PM<sub>2.5</sub> Plan

The RFP plan and quantitative milestones are discussed in Appendix VI, section VI-C (pp. VI-C-5 to VI-C-8) of the 2016 AQMP. The Plan estimates that emissions of direct PM<sub>2.5</sub>, NO<sub>x</sub>, VOC, SO<sub>2</sub> and ammonia will generally decline from the 2012 base year to 2019 and states that emissions of each of these pollutants will remain below the levels needed to show

"generally linear progress" from 2012 to 2019, the year that the Plan projects to be the earliest practicable attainment date for the 2006 PM<sub>2.5</sub> NAAQS.<sup>140</sup> The Plan's emissions inventory shows that direct PM<sub>2.5</sub>, NO<sub>x</sub>, VOC, SO<sub>2</sub> and ammonia are emitted by a large number and range of sources in the South Coast and that the emission reductions needed for each of these pollutants are inventory wide.<sup>141</sup> Table VI-C-4 of the 2016 AQMP contains an implementation schedule for District control measures and Table VI-C-3 of the 2016 AQMP (reproduced in Table 4 below) contains RFP projected emissions for each quantitative milestone year and the attainment year. Based on these analyses, the District concludes that its adopted control strategy will achieve, for each pollutant, projected emission levels at or below the RFP, quantitative milestone, and attainment year target emission levels (see Table 5 below).<sup>142</sup>

TABLE 4—24-HOUR PM<sub>2.5</sub> BASELINE EMISSIONS FOR BASE AND MILESTONE YEARS

[Annual average tpd]

Pollutant	2012	2017 (Quantitative milestone)	2019 (Attainment deadline)	2020 (Quantitative milestone)
PM <sub>2.5</sub>	66.4	63.8	63.9	63.9
NO <sub>x</sub>	540	398	353	330
SO <sub>2</sub>	18.4	17.1	16.6	16.7
VOC	470	392	376	370
NH <sub>3</sub>	81.1	75.5	74.0	73.3

Source: 2016 AQMP, Appendix VI-C, Table VI-C-3.

TABLE 5—SUMMARY OF 24-HOUR PM<sub>2.5</sub> RFP CALCULATIONS

[Annual average tpd]

Row	Calculation step	PM <sub>2.5</sub>	NO <sub>x</sub>	SO <sub>2</sub>	VOC	NH <sub>3</sub>
1	2012 base year emissions	66.4	540	18.4	470	81.1
2	Annual percent change needed to show linear progress (%)	0.55	4.9	1.4	2.9	1.2
3	2017 Target Needed to show linear progress (tpd)	64.6	406	17.1	403	76.0
4	2017 Baseline emissions (tpd)	63.8	398	17.1	392	75.5
5	Projected shortfall (tpd)	0	0	0	0	0
6	Surplus in 2017 (tpd)	0.85	8.6	0.05	10.4	0.48
7	Emissions Equivalent to 1 Year's Worth of RFP	0.36	26.7	0.25	13.5	1.0
8	2019 Baseline Emissions (tpd)	63.9	353	16.6	376	74.0

Source: 2016 AQMP, Appendix VI-C, Table VI-C-3A.

The 2016 PM<sub>2.5</sub> Plan documents the State's conclusion that all BACM and BACT for these pollutants are being

implemented as expeditiously as practicable and identifies projected levels of direct PM<sub>2.5</sub>, NO<sub>x</sub>, VOC,

ammonia, and SO<sub>2</sub> emissions in 2017 and 2019 that reflect full implementation of the state, district,

<sup>137</sup> General Preamble at 13539, Addendum at 42016.

<sup>138</sup> 79 FR 31566 (June 2, 2014) (final rule establishing subpart 4 moderate area classifications and deadline for related SIP submissions) ("Classification and Deadline Rule"). Although the Classification and Deadline Rule did not affect any action that the EPA had previously taken under

CAA section 110(k) on a SIP for a PM<sub>2.5</sub> nonattainment area, the EPA noted that states may need to submit additional SIP elements to fully comply with the applicable requirements of subpart 4, even for areas with previously approved PM<sub>2.5</sub> attainment plans, and that the deadline for any such additional plan submissions was December 31, 2014. *Id.* at 31569.

<sup>139</sup> 40 CFR 51.1013(a)(4).

<sup>140</sup> 2016 AQMP, Appendix VI-C, p. VI-C-7, Tables VI-C-3 and VI-C-3A.

<sup>141</sup> 2016 AQMP, Chapter 4 and Appendices IV-A, VI-B and VI-C.

<sup>142</sup> 2016 AQMP, Appendix VI-C, p. VI-C-6.